# Case 3:18-cv-02621-WHO Document 126-1 Filed 05/15/19 Page 1 of 5 <u>Appendix 1 - Source Code Citations</u>

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	Legend:
	Source code cites provided
1	No code cited

List of Contentions for which Source Code Citations Provided for Each Element\*

## "Check Point Blade Architecture"

#### **IPS**

• '494 Patent: Claims 10 and 14

• '731 Patent: Claims 1, 14, and 17

• '844 Patent: Claims 1, 15, and 41

#### Anti-Bot

• '494 Patent: Claims 10 and 14

• '633 Patent: Claim 8

• '154 Patent: Claims 1 and 4

• '844 Patent: Claims 1, 15, and 41

• '086 Patent: Claims 24 and 42

#### Anti-Virus

• '494 Patent: Claims 10 and 14

• '633 Patent: Claim 8

• '154 Patent: Claims 1 and 4

• '731 Patent: Claims 1, 14, and 17

• '968 Patent: Claims 1, 9, 10, and 33

• '844 Patent: Claims 1, 15, and 41

• '086 Patent: Claims 24 and 42

#### Threat Emulation

• '494 Patent: Claims 10, 14, and 15

• '633 Patent: Claims 8, 14, and 34

• '154 Patent: Claim 1

• '731 Patent: Claims 1, 14, and 17

• '968 Patent: Claims 1, 9, 10, and 33

• '844 Patent: Claims 1, 15, 41, and 42

• '086 Patent: Claims 24 and 42

#### Threat Extraction

• '154 Patent: Claim 1

• '844 Patent: Claims 1, 15, and 41

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<sup>\*</sup> This list does not take into account the fact that, for the most part, Finjan did not cite source code to show that any accused product meets the preambles of the claims. Finjan has yet to take a position as to whether it contends the preambles are limiting. By compiling the list in this manner, Check Point does not waive its right to contend that the preambles are limiting and that Finjan has failed to show that the accused products meet those limitations.

List of Contentions for which Source Code Citations Provided for Each Element\*

# "Endpoint Security (Enterprise)"

## **Threat Emulation**

- '494 Patent: Claims 10 and 14
- '633 Patent: Claims 8, 14, and 34
- '154 Patent: Claims 1 and 4
- '731 Patent: Claim 17
- '844 Patent: Claim 15
- '086 Patent: Claims 24 and 42

## Threat Extraction

• '633 Patent: Claim 14

# AntiPhishing (zero phishing)

• '154 Patent: Claims 1 and 4

#### Anti-Ransomware

• '154 Patent: Claims 1 and 4

#### Anti-Bot

- '494 Patent: Claims 10 and 14
- '154 Patent: Claims 1 and 4
- '086 Patent: Claims 24 and 42

## Anti-Exploit

• '154 Patent: Claims 1 and 4

### Anti-Malware

- '494 Patent: Claims 10 and 14
- '086 Patent: Claims 24 and 42

List of Contentions for which Source Code Citations Provided for Each Element\*

## "ZoneAlarm"

## **Threat Emulation**

• '494 Patent: Claims 10 and 14

• '633 Patent: Claim 8

• '154 Patent: Claims 1 and 4

• '731 Patent: Claim 17

• '086 Patent: Claims 24, 33, and 42

#### **Browser Protection**

• '633 Patent: Claim 8

'154 Patent: Claims 1 and 4'086 Patent: Claims 24 and 33

#### **SandBlast Mobile**

• '494 Patent: Claims 10 and 14

• '633 Patent: Claim 8

• '154 Patent: Claim 1

• '731 Patent: Claim 17

• '086 Patent: Claims 24, 33, and 42

## "ThreatCloud"

#### Threat Emulation

• '633 Patent: Claim 8

• '731 Patent: Claim 17

• '844 Patent: Claims 1, 15 and 41

• '086 Patent: Claims 24, 33, and 42

List of New Products Added to Finjan's Amended Infringement Contentions

## New Products included in Amended Contentions

- IPSec VPN
- Mobile Access Blade
- Network Policy Management
- Endpoint Policy Management
- Next-Generation SmartEvent
- Logging and Status
- Compliance
- SmartWorkflow
- SmartProvisioning
- Monitoring
- Management Portal
- User Directory
- Operating System (Gaia/SecurePlatform)

## New Marketing Terms and Undefined Functionalities Referenced in Claim Charts

- "Context Management"
- "Content Inspection"
- "Threat Indicator"
- "File type check component"
- "Static analysis component"
- "Executable API Commands"
- "Sent Component Hooks"
- "Security Management"
- "Reporting"
- "Anti-Malware"
- "Endpoint ThreatCloud"
- "Endpoint Agent"
- Endpoint Security "Executable API Commands"
- "Endpoint client"
- Endpoint Security "Component hooks"

- ZoneAlarm "Executable API Commands"
- ZoneAlarm "Component Hooks"
- "ThreatCloud Server"
- "ThreatCloud API"
- "ThreatCloud Threat Intelligence feature"